

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANNA PATRICK, DOUGLAS MORRILL,
ROSEANNE MORRILL, LEISA GARRETT,
ROBERT NIXON, SAMANTHA NIXON,
DAVID BOTTONFIELD, ROSEMARIE
BOTTONFIELD, TASHA RYAN, ROGELIO
VARGAS, MARILYN DEWEY, PETER
ROLLINS, RACHAEL ROLLINS, KATRINA
BENNY, SARA ERICKSON, GREG
LARSON, and JAMES KING, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

DAVID L. RAMSEY, III, individually; HAPPY
HOUR MEDIA GROUP, LLC, a Washington
limited liability company; THE LAMPO
GROUP, LLC, a Tennessee limited liability
company,

Defendants.

Case No. 2:23-cv-00630-JLR

**DECLARATION OF TALLMAN H.
TRASK, IV IN SUPPORT OF
PLAINTIFFS' RESPONSE TO
DEFENDANT HAPPY HOUR MEDIA
GROUP'S JOINDER IN MOTION TO
COMPEL ARBITRATION AND MOTION
TO COMPEL ARBITRATION**

Noting Date: August 9, 2024

1 My name is Tallman H. Trask, IV. My Washington State Bar Association number is
2 60280. I am over the age of eighteen years and make this declaration under penalty of perjury.

3 1. I, alongside Plaintiffs' other counsel, propounded discovery requests on Happy Hour
4 Media Group on March 6, 2024.

5 2. Happy Hour Media Group served responses on April 19, 2024. Happy Hour Media
6 Group's responses to Plaintiffs' Requests for Production primarily state that "[o]n
7 September 3, 2021, in the matter of *Siegrist v. Reed Hein & Associates, et al.*,
8 Snohomish County Superior Court No. 21-2-01757-31, Plaintiff's counsel received
9 documents from Reed Hein & Associates labeled 'RHA_Seigrist_001191-141385.'
10 These documents were originally produced by Happy Hour in response to a subpoena
11 in the matter of *State of Washington v. Reed Hein*, King County Superior Court No.
12 20-2-03141-1 SEA. Happy Hour consents to these documents being treated as if they
13 were produced by Happy Hour in discovery in this matter." These documents, which
14 Plaintiffs' counsel refers to as the Seigrist documents, consist of nearly 140,000 pages
15 of Happy Hour Media Group's records related to this case. No other party to this case
16 has produced responsive documents of a similar volume. A truncated copy of Happy
17 Hour Media Group's responses is attached to this declaration as **Exhibit 1**.

18 3. On or around June 18, 2024, Plaintiffs served a subpoena on Brandon Reed, the
19 former founder and CEO of Reed Hein & Associates LLC, through his counsel.
20 Plaintiffs were seeking documents related to this case. Mr. Reed responded to
21 Plaintiffs' subpoena on July 15, 2024, substantially stating that he was not in
22 possession of any such documents. Mr. Reed's response is attached to this declaration
23 as **Exhibit 2**.

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3 DATED this 26th day of July, 2024.
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